

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MICHAEL AMARAL)	
)	
Plaintiff,)	
)	Civil Action
v.)	No. 04-11778 GAO
)	
PENN MARITIME, INC.,)	
)	
Defendant.)	
_____)	

MOTION FOR ADMISSION PRO HAC VICE

Now comes Timothy R. McHugh, counsel for the Defendant in this action, and a member of the Bar of this Honorable Court since 1979, and moves for the admission of Gino A. Zonghetti, of the Bar of the United States District Court for the Southern District of New York, to appear before the Court in this matter, pro hac vice. As noted on Mr. Zonghetti's Affidavit attached hereto, he is in good standing, there are no disciplinary proceedings pending against him as a member of the Bar in any jurisdiction, and he is familiar with the local rules of the United States District Court for the District of Massachusetts.

Mr. Zonghetti is an experienced maritime lawyer, a member of the Maritime Law Association of the United States, and in all aspects is fully qualified to appear before you. Mr. Zonghetti has represented defendant Penn Maritime, Inc. in maritime personal injury matters since 1991 and defendant Penn Maritime, Inc. has requested that he represent its interests in this case.

Wherefore, the Defendant prays that this Motion be granted.

Dated: February 10, 2005

Respectfully submitted,

PENN MARITIME, INC.,

By its attorney,

/s/Timothy R. McHugh

Timothy R. McHugh (BBO #335480)

11 Hickory Road

Southborough, MA 01772

(617) 593-5405

Assented to:

/s/John E. Sutherland

John E. Sutherland, B.B.O. No. 488960

Brickley Sears & Sorette, P.A.

75 Federal Street

Boston MA 02110

617-542-0896

I hereby certify that I served a copy of the within pleading on all counsel of record by first class mail and electronically on February 10, 2005.

/s/ Timothy R. McHugh

Timothy R. McHugh